

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC, *et al.*,

Defendants.

Civil No. 1:18-cv-950 (LO / JFA)

**COX'S MOTION FOR RELIEF FROM THE JUDGMENT UNDER RULE 60(B)(3) AND
REQUEST FOR INDICATIVE RULING UNDER RULE 62.1**

Defendants Cox Communications, Inc. and CoxCom, LLC ("Cox") respectfully move this Court for relief from the judgment under Federal Rule of Civil Procedure 60(b)(3) and request an indicative ruling under Federal Rule of Civil Procedure 62.1.

Cox states the specific grounds for this motion in the accompanying Memorandum of Law In Support Of Its Motion For Relief From The Judgment Under Rule 60(b)(3) And Request For Indicative Ruling Under Rule 62.1.

Dated: December 27, 2021

Respectfully submitted,

/s/ Thomas M. Buchanan

Thomas M. Buchanan (VSB No. 21530)

J. Tyler McGaughey (VSB No. 78809)

WINSTON & STRAWN LLP

1901 L Street NW

Washington, DC 20036

Tel: (202) 282-5000

Fax: (202) 282-5100

Email: TBuchana@winston.com

Email: TMcGaughey@winston.com

*Attorney for Cox Communications, Inc.
and CoxCom, LLC*

Of Counsel for Defendants

Michael S. Elkin (*pro hac vice*)
WINSTON & STRAWN LLP
200 Park Avenue
New York, NY 10166-4193
Telephone: (212) 294-6700
Facsimile: (212) 294-4700
Email: MElkin@winston.com

Jennifer A. Golinveaux (*pro hac vice*)
WINSTON & STRAWN LLP
101 California Street, 35th Floor
San Francisco, CA 94111-5840
Telephone: (415) 591-1000
Facsimile: (415) 591-1400
Email: JGolinveaux@winston.com

Geoffrey P. Eaton (*pro hac vice*)
WINSTON & STRAWN LLP
1900 L Street NW
Washington, DC 20036
Tel: (202) 282-5000
Fax: (202) 282-5100
Email: GEaton@winston.com

Michael L. Brody (*pro hac vice*)
WINSTON & STRAWN LLP
35 W. Wacker Dr.
Chicago, IL 60601
Telephone: (312) 558-5600
Facsimile: (312) 558-5700
Email: MBrody@winston.com

CERTIFICATE OF SERVICE

I certify that on December 27, 2021, a copy of the foregoing was filed electronically with the Clerk of Court using the ECF system, which will send notifications to ECF participants.

/s/ Thomas M. Buchanan
Thomas M. Buchanan